

**GEORGE K. CHEBAT (034232)**

George@EnaraLaw.com

**JOSEPH J. TOBONI (031385)**

Joseph@EnaraLaw.com

**DANIEL DE JULIO (035854)**

Danny@Enaralaw.com

**Enara Law PLLC**

7631 East Greenway Road, Suite B-2

Scottsdale, Arizona 85260

Telephone: (602) 687-2010

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF ARIZONA**

Valentino Dimitrov, individually, and on  
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota  
corporation; Stavatti Aerospace, Ltd, a  
Wyoming corporation; Stavatti  
Corporation, a Minnesota corporation;  
Stavatti Immobiliare, Ltd, a Wyoming  
corporation; Stavatti Industries, Ltd, a  
Wyoming corporation; Stavatti Niagara,  
Ltd, a New York corporation; Stavatti  
Super Fulcrum, Ltd, a Wyoming  
corporation; Stavatti Ukraine, a Ukrainian  
business entity; Stavatti Heavy Industries  
Ltd, a Hawaii corporation; Christopher  
Beskar and Maja Beskar, husband and  
wife; Brian Colvin and Corrina Colvin,  
husband and wife; John Simon and Jean  
Simon, husband and wife; William  
McEwen and Patricia McEwen, husband  
and wife; Rudy Chacon and Jane Doe  
Chacon, husband and wife; and DOES 1  
through 10, inclusive,

Defendants.

Case No.: 2:23-CV-00226-DJH

**PLAINTIFF'S APPLICATION FOR  
ENTRY OF DEFAULT AGAINST  
DEFENDANTS STAVATTI  
AEROSPACE LTD, A WYOMING  
CORPORATION; STAVATTI  
IMMOBILIARE, LTD, A WYOMING  
CORPORATION; STAVATTI  
INDUSTRIES, LTD, A WYOMING  
CORPORATION; STAVATTI SUPER  
FULCRUM LTD, A WYOMING  
CORPORATION; AND STAVATTI  
HEAVY INDUSTRIES LTD, A HAWAII  
CORPORATION**

1 Plaintiff Valentino Dimitrov (“Plaintiff”) requests the Clerk of Court enter default  
2 against Defendants: Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti  
3 Immobiliare, Ltd, a Wyoming corporation; Stavatti Industries, Ltd, a Wyoming  
4 corporation; Stavatti Super Fulcrum, LTD, a Wyoming corporation; and Stavatti Heavy  
5 Industries Ltd, a Hawaii corporation (collectively, “Defendants”) pursuant to Fed. R. Civ.  
6 P. 55(a).

7 In support of this request, Plaintiff relies on the record in this case and the affidavit  
8 submitted as “**Exhibit A**”.

9  
10 **RESPECTFULLY SUBMITTED** this 3rd day of April, 2023.

11  
12 **ENARA LAW, PLLC**

13 By: /s/ George K. Chebat  
14 George K. Chebat  
15 Joseph J. Toboni  
16 Daniel de Julio  
17 *Attorneys for Plaintiff*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of April, 2023, a copy of the foregoing was transmitted electronically to the CM/ECF filing system for filing and transmittal along with copies transmitted to all counsel of record via the CM/ECF system.

By: /s/ Shelly N. Witgen, ACP